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*Attorneys for Defendant  
Gonowabie Properties, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

REUBEN RICHARDS, an individual, and  
ROBERT GOLDBERG, an individual,

Plaintiff,

vs.

TAHOE REGIONAL PLANNING AGENCY;  
MARSHA BERKBIGLER, individually and in  
her capacity as a Governing Board Member of  
the Tahoe Regional Planning Agency; and  
GONOWABIE PROPERTIES, LLC, a  
Nevada limited liability company,

Defendants.

Case No. 3:20-cv-00468-RCJ-WGC

**STIPULATION TO EXTEND  
DEFENDANTS' TIME TO ANSWER OR  
OTHERWISE RESPOND  
TO THE COMPLAINT  
(First Request)**

Plaintiffs REUBEN RICHARDS, an individual, and ROBERT GOLDBERG, an individual, by and through their counsel, Courtney G. Forster, Esq, of the Gunderson Law Firm, Defendants TAHOE REGIONAL PLANNING AGENCY and MARSHA BERKBIGLER, individually and in her capacity as a Governing Board Member of the Tahoe Regional Planning Agency, by and through these Defendants' counsel, Debbie A. Leonard, Esq, of Leonard Law

1 PC, and Defendant GONOWABIE PROPERTIES, LLC, by and through one of its counsel,  
 2 William A.S. Magrath II, of McDonald Carano LLP, do hereby stipulate as follows:

3 On August 17, 2020, Plaintiffs REUBEN RICHARDS (“Richards”) and ROBERT  
 4 GOLDBERG (“Goldberg”) filed Plaintiffs’ Verified Complaint for Declaratory and Injunctive  
 5 Relief; and Related Pendant State Law Petition for Writ of Certiorari/Writ of Mandamus (the  
 6 “Complaint”) commencing the above-entitled-action. A copy of a Summons and the Complaint  
 7 was subsequently served on each Defendant or service was accepted by each Defendant.


8 In support of this Stipulation, counsel for all parties state as follows:

- 9 1. The current deadline for Defendant Gonowabie Properties LLC to answer or  
 10 otherwise respond is Wednesday, September 9, 2020.
- 11 2. The current deadline for Defendants Tahoe Regional Planning Agency and  
 12 Marsha Berkbigler to answer or otherwise respond is Tuesday, September 15,  
 13 2020.
- 14 3. This is the first Stipulation to extend the time to answer or otherwise respond to  
 15 the Complaint.
- 16 4. This request for an extension of time is made before the expiration of any  
 17 deadline to answer or otherwise respond to the Complaint by any Defendant.
- 18 5. The reason the parties request this extension is to facilitate discussions between  
 19 the parties which may reduce or eliminate certain issues in dispute in the action  
 20 and this additional time will allow for this communication to occur.

21 As a result of the above, counsel for all parties now agree to extend the time for each  
 22 Defendant to answer or otherwise respond to the Complaint to Tuesday, September 29, 2020.

23 McDONALD CARANO LLP

24  
 25 Dated: September 9, 2020

26 By:   
 27 William A.S. Magrath II, Esq. SBN-1490  
 28 100 West Liberty St., 10<sup>th</sup> Floor  
 Reno, NV 89501  
 Telephone: (775) 788-2000  
 Attorneys for Defendant Gonowabie  
 Properties, LLC

THE GUNDERSON LAW FIRM

Dated: September 9, 2020

By: /s/ Courtney G. Forster  
Courtney G. Forster, Esq. SBN 10775  
3895 Warren Way  
Reno, NV 89509  
Telephone: (775) 829-1222  
*Attorneys for Plaintiffs Reuben Richards and  
Robert Goldberg*

LEONARD LAW, PC

Dated: September 9, 2020

By: /s/ Debbie A. Leonard, Esq.  
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955 South Virginia Street, Suite 220  
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Telephone: (775) 964-4656  
*Attorneys for Defendants Tahoe Regional  
Planning Agency and Marsha Berkbighler*

IT IS HEREBY ORDERED.

Walter G. Cobb  
UNITED STATES MAGISTRATE JUDGE

Date: September 10, 2020